

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

MARTHA BOERSCH (CABN 126569)
Chief, Criminal Division

CHRISTIAAN HIGHSMITH (CABN 296282)
DAVID WARD (CABN 239504)
Assistant United States Attorneys

MATTHEW CHOU (CABN 325199)
Special Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7230
christiann.hightsmith@usdoj.gov
david.ward@usdoj.gov
matthew.chou2@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) NO. CR 20-00249 RS
Plaintiff,)
v.)
ROWLAND MARCUS ANDRADE) **JOINT PROPOSED ADDITIONAL JURY**
Defendant.) **QUESTIONNAIRE QUESTIONS**
Dept.: Courtroom 3 – 17th Floor
Judge: Hon. Richard Seeborg
Trial Date: February 10, 2025

The Court invited the parties to submit 10 additional questions to add to the Court's standard Jury Questionnaire. The parties have met and conferred and request these questions:

1. Have you ever purchased or invested in any cryptocurrency? If so, what happened with that investment?
2. Have you ever heard of a cryptocurrency called AML Bitcoin or AtenCoin?

3. Have you ever invested anything or invested in anything after being cold called by someone
on telephone? What happened with that purchase or investment?
4. Have you or any of your close family members been the victim of an fraud?
5. Do you, your close friends, or your family members work for the Port of San Francisco or for
the news media?
6. The facts of this case will include extensive discussion of cryptocurrency, a kind of digital
money. Cryptocurrency has been in the news and on social media a great deal and many
people have formed opinions that anyone who sells cryptocurrency must be a criminal, or at
least shady. What do you think about people who sell cryptocurrency?
7. You may hear testimony in this case from an alleged co-schemer of the defendant who is in
serious medical condition due to an illness. Would your evaluation of a witness's credibility
or truthfulness be affected by the fact that they may be in the final stages of life?
 - a. Yes
 - b. Maybe
 - c. No

If Yes or Maybe, please explain:

8. You may hear that some people who are personal or professional relations of the defendant
previously did bad things in their own lives. How would that impact the way you think about
the defendant?
9. Sometimes people may explain their own behavior or somebody else's behavior by citing to
a mental illness or disability. Some may believe that this is usually nothing more than a way
of avoiding responsibility. What do you think about that?
10. During this case, you may hear that the defendant did things in his personal or professional
relationships that you don't like. Would this, standing by itself, have an impact on how you
view the defendant's guilt or innocence?
 - a. Yes
 - b. Maybe
 - c. No

1 If Yes or Maybe, please explain:
2
3
4
5

6 DATED: January 17, 2025

Respectfully submitted,

7 ISMAIL J. RAMSEY
8 United States Attorney

9
10 /s/
11 CHRISTIAAN HIGHSMITH
12 DAVID J. WARD
13 Assistant United States Attorneys

14
15 /s/
16 MICHAEL SHEPARD
17 KERRIE DENT
18 CINDY DIAMOND
19 DAINEC STEFAN
20
21
22
23
24
25
26
27
28

Attorneys for Defendant ROWLAND
MARCUS ANDRADE